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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. JAREN MICHAEL STENNERSON, Defendant.	CR 22-139-BLG-SPW OFFER OF PROOF
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The United States of America, represented by Julie R. Patten, Assistant United States Attorney for the District of Montana, files its Offer of Proof in anticipation of the Change of Plea hearing scheduled for March 10, 2023.

THE CHARGE

The defendant, Jaren Michael Stennerson, is charged by indictment with Count 1, Prohibited Person in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(3) (Count 1) and Receipt of a Firearm by Person Under Indictment for a Felony, in violation of 18 U.S.C. § 922(n) (Count 2).

PLEA AGREEMENT

There is a plea agreement. Stennerson will plead guilty to the indictment. The United States presented all formal plea offers to the defendant in writing. The plea agreement entered into by the parties and filed with the court represents, in the government's view, the final and the most favorable offer extended to the defendant. *See Missouri v. Frye*, 566 U.S. 134, 145-46 (2012).

ELEMENTS OF CHARGE

In order for Stennerson to be found guilty of prohibited person in possession of a firearm, as charged in indictment in Count 1, the United States must prove each of the following elements beyond a reasonable doubt:

First, the defendant knowingly possessed a firearm;

Second, at the time he possessed the firearm the defendant knew he was an unlawful user of any controlled substance;

Third, the firearm was shipped in interstate or foreign commerce.

In order for Stennerson to be found guilty of Receipt of a Firearm by Person Under Indictment for a Felony, as charged in indictment in Count 2, the United States must prove each of the following elements beyond a reasonable doubt:

First, the defendant was under indictment for a felony;

Second, the defendant willfully received a firearm that had been shipped or transported between a foreign nation and the United States.

PENALTY

Count 1 carries a penalty of ten years imprisonment, a \$250,000 fine, three years of supervised release, and a \$100 special assessment.

Count 2 carries a penalty of five years imprisonment, a \$250,000 fine, three years of supervised release, and a \$100 special assessment.

The defendant will also plead true to the forfeiture allegation contained in the indictment.

ANTICIPATED EVIDENCE

If this case were tried in United States District Court, the United States would prove the following:

Jaren Stennerson was charged in state court with two felonies – burglary and criminal possession of dangerous drugs. On August 27, 2019, and then again on

March 15, 2022. Stennerson appeared in Court and was ordered not to possess firearms.

On March 30, 2022, the United States Marshals Violent Offender Task Force arrested Michael Torres on a federal arrest warrant. With him at the time was Jaren Stennerson who was in possession of a stolen firearm. That firearm was identified as a CZ, Model CZ82, 9mm caliber pistol (s/n: 123915), with two magazines, and three rounds of 9mm caliber ammunition. The seized firearm was manufactured outside the United States therefore it affected foreign commerce.

In a subsequent interview, Stennerson admitted to having a firearm in his pocket when contacted by the Marshals. He advised he had purchased the firearm for protection, on March 29, 2022 for \$100. Stennerson admitted to being under felony indictment. Stennerson also advised he is a daily methamphetamine user who uses “a shot a day” of meth.

DATED this 6th day of March, 2023.

JESSE A. LASLOVICH
United States Attorney

/s/ Julie R. Patten
JULIE R. PATTEN
Assistant U.S. Attorney